

DOCKET FILE COPY ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

163
RECEIVED

JUL 17 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of)
)
Amendment of Section 73.606(b)) MM Docket No. _____
Table of Allotments) RM-
Television Broadcast Stations)
and)
Amendment of Section 73.622(b))
DTV Table of Allotments)
Television Broadcast Stations)
)
(Vineland, New Jersey))

To: Chief, Allocations Branch, Mass Media Bureau

JOINT PETITION FOR RULE MAKING

Imagine Television ("ITV") and Marri Broadcasting, L.P. ("Marri") (collectively "Petitioners"), by their attorneys, and pursuant to Section 1.401 of the Commission's rules and its *Public Notice*, DA 99-2605 (released November 22, 1999) ("Mass Media Bureau Announces Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations") ("*Window Filing Notice*"),¹ hereby request that the Commission institute a rule making proceeding for the purpose of (i) amending the NTSC TV Table of Allotments to delete Channel 59- at Vineland, New Jersey, and (ii) amending the DTV Table of Allotments to add Channel 24 at Vineland, New Jersey.

No. of Copies rec'd 0+4
List A B C D E
MMB

¹ On March 9, 2000, The Commission extended the window filing period until July 15, 2000. See *Public Notice*, 15 FCC Rcd 4974 (2000) ("Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations Extended to July 15, 2000").

Accordingly, Petitioners propose to amend Section 73.606(b) of the Commission's rules as follows:

City	Channel No.	
	Present	Proposed
Vineland, New Jersey	59-, 65-	65-

Petitioners also propose to amend Section 73.622(b) of the Rules as follows:

City	Channel No.	
	Present	Proposed
Vineland, New Jersey	—	24

ITV and Marri currently have competing applications pending for a new NTSC television station to operate on Channel 59- at Vineland, New Jersey (File Nos. BPCT-960920YV and BPCT-960920LO, respectively). As is indicated in the attached engineering statement, Channel 59- at Vineland would cause impermissible interference to WBPH-DT, Channel 59, Bethlehem, Pennsylvania; accordingly, the instant petition is properly submitted pursuant to the *Window Filing Notice*.

As demonstrated by the attached engineering statement, the proposed addition of DTV Channel 24 at Vineland meets all allocation criteria specified in the Commission's rules and in the above-referenced *Public Notice*.² Further, the *Public Notice* expressly authorizes petitioners to request a DTV channel in lieu of an NTSC channel.

In the event DTV Channel 24 is allotted to Vineland, Petitioners will amend their pending applications in accordance with the Report and Order issued in this proceeding to

² While Petitioners do not believe that such a waiver is necessary, out of an abundance of caution waiver is requested of any interference in excess of the 0.5% "rounding factor" to WNYE-DT, Channel 24, New York, New York (the interference to WNYE-DT is calculated to be 0.6%). Petitioners would not object to a condition attached to the requested DTV allotment to the effect that radiation must be limited to a specified value in the direction of WNYE-DT.

specify the new channel, and will modify their technical proposals as necessary so that their proposed facilities will meet all applicable allotment criteria. In the event its application is granted, ITV or Marri, as the case may be, will timely construct the facilities authorized.

For the reasons stated, Petitioners respectfully request that the Commission GRANT this petition for rule making, AMEND the NTSC Table of Allotments by deleting Channel 59- at Vineland, New Jersey, and AMEND the DTV Table of Allotments by adding DTV Channel 24 at Vineland, New Jersey.

Respectfully submitted,

IMAGINE TELEVISION

July 17, 2000

Cohn & Marks
1920 N St., NW
Suite 300
Washington, DC 20036
(202)293-3860

By:

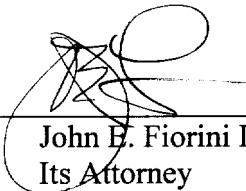

Jerold L. Jacobs
Its Attorney

MARRI BROADCASTING, L.P.

July 17, 2000

Gardner, Carton & Douglas
1301 K Street, N.W.
Suite 900, East Tower
Washington, D.C. 20005-3317
(202)408-7159

By:


John E. Fiorini III
Its Attorney

ENGINEERING STATEMENT
PREPARED IN SUPPORT OF
PETITION FOR RULEMAKING
AMENDMENT OF SECTION 73.622(b)
TABLE OF ALLOTMENTS
DELETE NTSC CHANNEL 59- VINELAND, NEW JERSEY 73.606(b)
ADD DTV CHANNEL 24 VINELAND, NEW JERSEY 73.622(b)

JUNE 2000

**ENGINEERING STATEMENT
PREPARED IN SUPPORT OF
PETITION FOR RULEMAKING
AMENDMENT OF SECTION 73.622(b)
TABLE OF ALLOTMENTS
DELETE NTSC CHANNEL 59- VINELAND, NEW JERSEY 73.606(b)
ADD DTV CHANNEL 24 VINELAND, NEW JERSEY 73.622(b)**

JUNE 2000

SUMMARY

The following engineering statement has been prepared on behalf of **Imagine Television (“ITV”)** and **Marri Broadcasting, L.P. (“Marri”)**, mutually exclusive applicants for a new NTSC full service television station to operate on Channel 59-, Vineland, New Jersey. The pending applications’ file numbers are BPCT-960920YV and BPCT-960920LO, respectively. This Petition is filed in response to FCC Public Notice DA 99-2605, “Mass Media Bureau Announces Window Filing Opportunity For Certain Pending Applications And Allotment Petitions For New Analog TV Stations”, released November 22, 1999 and in accordance with the alternative amendment options offered therein. The applicants request that the NTSC Table of Allotments, Section 73.606(b), be amended to delete Channel 59- at Vineland, New Jersey and that the DTV Table of Allotments, Section 73.622(b), be amended to add Channel 24 at Vineland, New Jersey.

The pending **ITV** Channel 59 application has been analyzed using the OET-69 methodology and found to cause unmasked interference to **WBPH-DT**, Channel 59, Bethlehem, Pennsylvania in excess of 50% of the **WBPH** Grade B population. The pending **Marri** Channel 59 application has also been analyzed and was found to cause unmasked interference to **WBPH-DT**, Channel 59, in excess of 37% of the **WBPH** Grade B population. These levels of interference far exceed the allowable value and form a basis for the filing of the instant Petition for Rulemaking.

This engineering statement is complete with the following:

- | | |
|------------|--|
| Table I. | Summary of initial television allocation study data. |
| Table II. | DTV interference study. |
| Table III. | Horizontal plane radiation pattern tabulation, PSI LPD16AH/24. |

Table IV.	Elevation pattern tabulation, PSI LPD16AH/24.
Table V.	HAAT and distance to contour data for proposed Channel 24 DTV facility.
Figure 1.	Comparison of pending NTSC 64 dBu and NTSC service areas.
Figure 2.	Vertical plan sketch.
Figure 3.	F(50,90) 41 dBu predicted DTV service contours.
Figure 4.	PSI LPD16AH/24 horizontal plane radiation pattern.
Figure 5.	PSI LPD16AH/24 elevation pattern.
Figure 6.	LPTV allocation mapping.
Figure 7.	LPTV allocation mapping - W24BB with 6 dB receive antenna directivity factor applied.

The requested change in the Table of Allotments can be made in full conformance with the FCC Rules and the DTV channel change will permit the introduction of a new, second TV service to Vineland, New Jersey.

It is noted that the November 22, 1999 Notice is not 100% clear concerning 0.5% rounding interference nor 2% de minimis interference for DTV. In an abundance of caution, the petitioners herein request a waiver for any interference caused in excess of the 0.5% rounding factor to WNYE(DT) Channel 24, New York, New York. A modified horizontal plane radiation pattern can be proposed, if required, but such a proposal is to be avoided, if possible, at the Rulemaking stage. The petitioners would not object to a condition in the DTV allotment that radiation be limited to a specified value in the direction of the WNYE final approved service area.

BACKGROUND

ITV's and Marri's pending TV applications propose different sites and overlapping service areas as seen on Figure 1, attached. The proposed DTV allotment specifies the currently proposed Marri site and RC AMSL. The directional antenna pattern and ERP have been chosen to duplicate as much of the originally proposed NTSC service areas as possible while meeting all FCC DTV interference protection criteria to existing NTSC

stations and DTV allotments. The predicted Channel 24 DTV 41 dBu F(50,90) contour is also depicted on Figure 1.

It is noted that the proposed site is believed to be the best location for the proposed Vineland, New Jersey TV station in terms of viewer compatibility. The only other Vineland TV station, WHSP-TV, Channel 65, is located 0.8 km from the proposed site, allowing TV viewers with outside receiving antennas to set their antennas for the same orientation for both stations as well as co-located WPSJ-LP, Channel 8, Hammonton, New Jersey and WNJS, Channel 23, Camden, New Jersey.

Figure 2 is a vertical plan sketch for the proposed Channel 24 DTV facility.

ALLOCATION CONSIDERATIONS - FULL SERVICE

No VHF TV channel is available for full service operation to the community of Vineland, New Jersey nor for the proposed service area. Table I is an allocation summary of UHF Channels 14-51. Channel 24, the channel proposed herein, is believed to be the only viable "in-core" channel for use by the applicants at Vineland, New Jersey.

The requested allocation of DTV Channel 24 is summarized as follows:

Coordinates:	N.L. 39° 43' 41"
(NAD 27)	W.L. 74° 50' 39"
Radiation Center:	269 M AMSL
HAAT:	244 meters
ERP:	100 kW MAX. (DA)
Antenna:	Horizontal polarization PSI LPD16AH/24 0.5 degree beam tilt
Tower Registration:	1045125

The requested substitution of DTV Channel 24 for NTSC Channel 59- at Vineland, New Jersey complies fully with the de minimis interference criteria of *Section 73.623(c)(2)* of the FCC Rules. An analysis of the

proposed DTV allotment has been conducted employing the methodology described in FCC Office of Engineering Technology ("OET"), Bulletin No. 69 "Longley-Rice Methodology for Evaluating TV Coverage and Interference" as implemented on the time share system at NTIA /ITS, Boulder, Colorado. Results have been compared with output from ComStudy V 2.2, DTV Allocation Study Module. Outputs from both programs were found to be in close agreement with each other as well as published FCC allotment data for the stations studied. Table II is a tabulation of all stations studied with a detailed interference analysis for the four stations to which the proposed facility will cause de minimis interference.

ALLOCATION CONSIDERATIONS - LPTV

The Report and Order in MM Docket No. 00-10, "Establishment of a Class A Television Service", released April 4, 2000, has been evaluated for its impact on the proposal herein. LPTV stations which have been considered for protection are listed below:

<u>Call Sign</u>	<u>Channel</u>	<u>City/ State</u>	<u>Distance - Kilometers</u>	<u>Bearing Degrees</u>	<u>Included in 6-2-2000 Certification List</u>
W23BA	23	E. Orange, NJ	129.7	23.1	No
W23AZ	23	Hackettstown, NJ	124.8	358.7	No

<u>Call Sign</u>	<u>Channel</u>	<u>City/ State</u>	<u>Distance - Kilometers</u>	<u>Bearing Degrees</u>	<u>Included in 6-2-2000 Certification List</u>
W23AY	23	York, PA	160.5	278.5	No
WEWE-LP	24	Sussex, DE	134.6	194.1	Yes
W59DH	24	Cherry Hill, NJ	0	0	No
W24BB	24	E. Stroudsburg, PA	154.7	338.7	Yes
W24BL	24	Pottsville, PA	156.4	312.4	No
W59CC	24	Reading, PA	113.7	307.7	No
W25BB	25	Pittstown, NJ	87.4	353.6	No
W25AW	25	Trenton, NJ	58.6	10.9	Yes
W27AJ	27	Dover, DE	82.0	222.8	No
WXTV-LP	28	Philadelphia, PA	48.2	315.8	Yes
W31BV	31	Atlantic City, NJ	54.0	141.0	No
W63CO	28	Philadelphia, PA	49.9	317.4	Yes

The stations which require protection are listed below with the appropriate F(50,10) interfering contour requirement for the proposed Channel 24 DTV allotment:

<u>Call</u>	<u>Channel</u>	<u>City/State</u>	<u>F(50,10)</u>
WEWE-LP CH 24		Sussex, DE	40 dBu
W24BB	CH 24	E. Stroudsburg, PA	40 dBu
W25AW	CH 25	Trenton, NJ	88 dBu
WXTV-LP	CH 28	Philadelphia, PA	99 dBu
W63CO	CH 28	Philadelphia, PA	99 dBu

The 74 dBu contour for each LPTV station, along with the associated F(50,10) Channel 24 DTV interference contour, is plotted on map Figure 6. No prohibited contour overlap is associated with WEWE-LP, W25AW, WXTV-LP and W63CO. The remaining LPTV station to be addressed is W24BB.

Figure 7 depicts the W24BB 74 dBu F(50,50) contour, the proposed Vineland F(50,10) 40 dBu, and the WNYE-DT, Channel 24, New York, New York allotment 40 dBu contour. *Section 73.623(c)(5)(iii)* includes a provision for utilization of *OET Bulletin No. 69* techniques. *OET Bulletin 69* provides for a receive antenna front to back ratio of 6 dB. By examination of Figure 6, it is seen that the proposed interfering contour does not overlap the W24BB transmitter site. In light of *OET Bulletin 69*, since all reception of W24BB in the overlap area will occur off the back of receive antennas directed at W24BB, it is believed appropriate to increase the interfering contour to 46 dBu. The 46 dBu contour is depicted on Figure 7 and there is no prohibited overlap in this scenario.

In addition, out of abundance of caution, a waiver of the Class A protection Rule, set forth in *Section 73.623(c)(5)(ii)*, is requested on the grounds that the area of prohibited overlap from the proposed Vineland channel is already subject to grandfathered overlap from WNYE-DT.

PRINCIPAL COMMUNITY COVERAGE

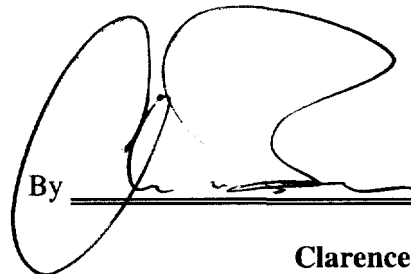
The proposed amendment to the Table of Allotments at Vineland, New Jersey complies fully with the principal community coverage requirements set forth in *Section 73.625(a)* of the FCC Rules. Table III is a tabulation

of the proposed horizontal plane radiation pattern, while Table IV is a tabulation of the proposed antenna elevation pattern. Table V is a tabulation of HAAT and distance to contour data for the proposed facility. Figure 3 depicts the predicted F(50,90) 41 dBu contour with respect to the community of Vineland, New Jersey.

CONCLUSION

The proposed substitution of DTV Channel 24 for NTSC Channel 59- can be made in full conformance with applicable FCC Rules with the possible exception noted on page 2 herein. The requested change will allow the community of Vineland, New Jersey to receive a new second local video service.

The foregoing was prepared on behalf of **Imagine Television and Marri Broadcasting, L.P.** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By 

Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

SUBSCRIBED AND SWORN TO before me,

this 30th day of June, 2000,

Esther G. Sperbeck, NOTARY PUBLIC

ESTHER G. SPERBECK
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT. 15, 2002

TABLE I

**SECTION 73.623(d) ALLOCATION STUDY
SEARCH FOR DTV CHANNEL
AS SUBSTITUTE FOR NTSC CH 59
VINELAND, NEW JERSEY**

JUNE 2000

<u>CHANNEL STUDIED</u>	<u>DISTANCE - KILOMETERS</u>		<u>COMMENTS</u>	<u>OPEN FOR FURTHER STUDY</u>
	<u>REQ.</u>	<u>ACTUAL</u>		
14	250	134.7	LM NY, CH 14	No
15	250	134.7	LM NY, CH 15	No
16	12-106	48.6	WPHL, CH 17, Phila., PA	No
17	217.3	48.6	WPHL, CH 17, Phila., PA	No
18	12-106	48.6	WPHL, CH 17, Phila., PA	No
19	250	36.3	LM Phil., CH 19	No
20	250	36.3	LM Phil., CH 20	No
21	176	36.3	LM Phil., CH 20	No
22	196.3	0	WNJS-DT, CH 22, Camden, NJ	No
23	217.3	0	WNJS, CH 23, Camden, NJ	No
* 24	24.1-80.5	48.6	WPHL, CH 17, Phil., PA	Yes
	12-106	0	WNJS, CH 23	Yes
	217.3	285.1	WEDH, CH 24, Hartford, CT	OK
	217.3	171.9	WUTB, CH 24, Baltimore, MD	Yes
	196.3	134.8	WNYE DT, CH 24, NY, NY	Yes
	217.3	370.7	WCNY, CH 24, Syracuse, NY	OK
	196.3	320.6	WATM-DT, CH 24, Altoona, PA	OK
	12-106	134.8	WNYE, CH 25, NY, NY	OK
	24-110	99.0	WTVE-DT, CH 25, Reading, PA	Yes
	24.1-80.5	48.4	WTXF, CH 29, Phila., PA	Yes
25	196.3	99.0	WTVE-DT, CH 25, Reading, PA	No
26	196.3	48.8	KYW-DT, CH 26, Phila., PA	No
27	196.3	48.8	WGTW-DT, CH 27, Burlington, NJ	No

**TABLE I
PAGE 2**

**SECTION 73.623(d) ALLOCATION STUDY
SEARCH FOR DTV CHANNEL
AS SUBSTITUTE FOR NTSC CH 59
VINELAND, NEW JERSEY**

JUNE 2000

<u>CHANNEL STUDIED</u>	<u>DISTANCE - KILOMETERS</u>		<u>COMMENTS</u>	<u>OPEN FOR FURTHER STUDY</u>
	<u>REQ.</u>	<u>ACTUAL</u>		
28	24.1-80.5	48.4	WTFX, CH 29, Phila., PA	No
29	217.3	48.4	WTFX, CH 29, Phila., PA	No
30	24.1-80.5	48.4	WTFX, CH 29, Phila., PA	No
31	196.3	39.1	WPPX-DT, CH 31, Wilmington, DE	No
32	24-110	39.1	WPPX-DT, CH 31, Wilmington, DE	No
33	24-110	48.4	WYBE-DT, CH 34, Phila., PA	No
34	196.3	48.4	WYBE-DT, CH 34, Phila., PA	No
35	217.3	48.4	WYBE, CH 35, Phila., PA	No
36	12-106	48.4	WYBE, CH 35, Phila., PA	No
38	196.3	161.4	WJZ-DT, CH 38, Baltimore, MD	Yes
	196.3	130.1	WWOR-DT, CH 38, NY, NY	Yes
	217.3	203.9	WSWB, CH 38, Scranton, PA	Yes
	12-106	105.8	WLVT, CH 39, Allentown, PA	No ¹
39	12-106	67.4	WMGM, CH 40, Wildwood, NJ	No
40	217.3	67.4	WMGM, CH 40, Wildwood, NJ	No
41	12-106	67.4	WMGM, CH 40, Wildwood, NJ	No
42	196.3	48.4	WTFX-DT, CH 42, Phila., PA	No
43	196.3	63.00	WNJT-DT, CH 43, Trenton, NJ	No
44	24-110	63.00	WNJT-DT, CH 43, Trenton, NJ	No
45	196.3	51.3	WWAC-DT, Atlantic City, NJ	No

**TABLE I
PAGE 3**

**SECTION 73.623(d) ALLOCATION STUDY
SEARCH FOR DTV CHANNEL
AS SUBSTITUTE FOR NTSC CH 59
VINELAND, NEW JERSEY
PAGE 3**

JUNE 2000

<u>CHANNEL STUDIED</u>	<u>DISTANCE - KILOMETERS</u>		<u>COMMENTS</u>	<u>OPEN FOR FURTHER STUDY</u>
	<u>REQ.</u>	<u>ACTUAL</u>		
46	24-110	51.3	WWAC-DT, Atlantic City, NJ	No
47	12-106	48.7	WGTW, CH 48, Burlington, NJ	No
48	217.3	48.7	WGTW, CH 48, Burlington, NJ	No
49	12-106	48.7	WGTW, CH 48, Burlington, NJ	No
50	196.3	23.5	WWAC-DT, CH 50, Atlantic City, NJ	No
51	196.3	137.6	WNJN-DT, CH 51, Montclair, NJ	No
	217.3	99.0	WTVE, CH 51, Reading, PA	No

* Channels 24 available for further study under Section 73.623(c) of the Rules.

¹ Precluded due to predicted interference significantly above 2% de minimis value.

NOTE: All distance and bearing computations are referenced to the proposed site coordinates located at:

N.L. 39° 43' 41"
W.L. 74° 50' 39"

TABLE II

DTV INTERFERENCE STUDY
PROPOSED CHANNEL 24 DTV
100 kW MAX. DA @ 244 METERS HAAT
VINELAND, NEW JERSEY

JUNE 2000

<u>STATIONS CONSIDERED</u>			<u>COMMUNITY</u>	<u>DIST.</u>	<u>BEARING</u>
<u>CALL</u>	<u>CHANNEL</u>	<u>SERVICE</u>	<u>OF LICENSE</u>	<u>KM</u>	<u>DEGREES</u>
WNJS	23	NTSC	Camden, NJ	0	0
WPHL	17	NTSC	Philadelphia, PA	48.5	316.0
WBIS	31	NTSC	New York, NY	130.1	32.5
WNYE	25	NTSC	New York, NY	134.8	32.4
WBOC	16	NTSC	Salisbury, MD	152.5	207.1
WCPB	28	NTSC	Salisbury, MD	162.6	203.6
WLIW	21	NTSC	Garden City, NY	166.8	44.6
WMPT	22	NTSC	Anapolis, MD	171.4	242.8
WHSW	24	NTSC	Baltimore, MD	171.5	254.0
WBRE	28	NTSC	Wilkes Barre, PA	183.4	332.2
WNEP	16	NTSC	Scranton, PA	183.6	332.1
WHP	21	NTSC	Harrisburg, PA	185.5	292.4
WDCA	20	NTSC	Washington, DC	212.1	247.1
WHMM	32	NTSC	Washington, DC	212.1	247.1
WTXX	20	NTSC	Waterbury, CT	251.6	37.2
WHAG	25	NTSC	Hagerstown, MD	267.1	269.4
WWPB	31	NTSC	Hagerstown, MD	267.5	269.2
WEDH	24	NTSC	Hartford, CT	284.9	36.4
WTWS	26	NTSC	New London, CT	291.8	49.1
WWLP	22	NTSC	Springfield, MA	317.7	33.8
WATM	23	NTSC	Altoona, PA	319.7	288.1
WXXA	23	NTSC	Albany, NY	328.5	11.9
WMHT	17	NTSC	Schenectady, NY	330.9	12.0

TABLE II
PAGE 2

STATIONS CONSIDERED			COMMUNITY	DIST.	BEARING
<u>CALL</u>	<u>CHANNEL</u>	<u>SERVICE</u>	<u>OF LICENSE</u>	<u>km</u>	<u>DEGREES</u>
WCVE	23	NTSC	Richmond, VA	343.4	225.1
WGNT	27	NTSC	Portsmouth, VA	353.6	204.1
WUTR	24	NTSC	Syracuse, NY	370.8	345.0
WUNI	20	NTSC	Utica, NY	390.8	355.9
WLWC	28	NTSC	New Bedford, MA	400.7	54.1
WFXT	42	NTSC	Boston, MA	417.5	45.5
WNPB	24	NTSC	Morgantown, WV	420.5	271.1
WPTT	22	NTSC	Pittsburgh, PA	422.0	282.4
WXXI	21	NTSC	Rochester, NY	442.1	329.8
WNNE	31	NTSC	Hartford, CT	458.2	24.9
WVER	28	NTSC	Rutland, VT	460.0	17.7
WNYB	16	NTSC	Watertown, NY	465.3	351.2
WNBU	26	NTSC	Jamestown, NY	471.9	310.3
WJPR	21	NTSC	Lynchburg, VA	494.9	238.8
WTVE	25	DTV	Reading, PA	98.9	312.5
WNYE	24	DTV	New York, NY	134.8	32.4
WLYH	23	DTV	Lancaster, PA	150.2	293.8
WHSI	23	DTV	Smithtown, NY	205.8	50.5
WATM	24	DTV	Altoona, PA	319.7	288.1
WTVR	25	DTV	Richmond, VA	331.5	224.4
WCVE	24	DTV	Richmond, VA	343.4	225.1
WCNY	25	DTV	Syracuse, NY	370.8	345.0
WHSI	23	DTV	Malborough, MA	407.4	42.5
KDKA	25	DTV	Pittsburgh, PA	448.0	282.6
WVTA	24	DTV	Windsor, VT	457.7	25.0
WNNE	25	DTV	Hartford, VT	458.2	24.9

TABLE II
PAGE 3

STATIONS WHICH RECEIVE INTERFERENCE

<u>Call/ Channel</u>	<u>City/ State</u>	<u>Grade B F(50,50)</u>	Population 1990 U.S. Census			<u>Prop. %</u>	<u>Existing %</u>	<u>Total %</u>
			<u>L. Rice Grade B</u>	<u>L. Rice Existing Interference</u>	<u>L. Rice With Existing & Prop. Interference</u>			
WNJS 23	Camden NJ	5,966,455	5,940,180	5,793,427	5,793,265	<0.1	2.5	2.5
WHSW 24	Baltimore MD	5,715,670	5,488,640	5,162,206	5,150,382	0.20	6.0	6.2
<u>Call/ Channel</u>	<u>City/ State</u>	<u>Grade B F(50,50)</u>	<u>L. Rice Grade B</u>	<u>L. Rice Existing Interference</u>	<u>L. Rice With Existing & Prop. Interference</u>	<u>Prop. %</u>	<u>Existing %</u>	<u>Total %</u>
WTVE 25 (DT)	Reading PA	4,773,196	3,494,609	3,494,609	3,491,437	0.1	0	0.1
WNYE 24 (DT)	New York NY	16,814,864	16,759,375	16,759,375	16,624,436	0.8	0	0.8

PROPAGATION SYSTEMS INC.

Relative Field Tabulation

Antenna Model: PSILPD16AH/24

Gain: 40.81 (16.11 dBd)

Angle	Relative Field	Gain	Gain dB
0	0.242	2.39	3.78
10	0.237	2.29	3.60
20	0.242	2.39	3.78
30	0.302	3.72	5.71
40	0.432	7.62	8.82
50	0.600	14.69	11.67
60	0.764	23.82	13.77
70	0.889	32.25	15.09
80	0.967	38.16	15.82
90	1.000	40.81	16.11
100	0.974	38.72	15.88
110	0.897	32.84	15.16
120	0.781	24.89	13.96
130	0.622	15.79	11.98
140	0.451	8.30	9.19
150	0.324	4.28	6.32
160	0.258	2.72	4.34
170	0.248	2.51	4.00
180	0.256	2.67	4.27
190	0.248	2.51	4.00
200	0.258	2.72	4.34
210	0.324	4.28	6.32
220	0.451	8.30	9.19
230	0.622	15.79	11.98
240	0.781	24.89	13.96
250	0.897	32.84	15.16
260	0.974	38.72	15.88
270	1.000	40.81	16.11
280	0.967	38.16	15.82
290	0.889	32.25	15.09
300	0.764	23.82	13.77
310	0.600	14.69	11.67
320	0.432	7.62	8.82
330	0.302	3.72	5.71
340	0.242	2.39	3.78
350	0.237	2.29	3.60

Table III

PROPAGATION SYSTEMS INC.

Relative Field Tabulation

Antenna Model: PSILPD16AH/24

Elevation Pattern: P61200-1A

Directivity: 16.59 (12.20 dB)

Beam Tilt: -.5 Degree

Angle	Relative Field
-90	0.000
-85	0.025
-80	0.059
-75	0.061
-70	0.052
-65	0.068
-60	0.053
-55	0.044
-50	0.042
-45	0.029
-40	0.030
-35	0.042
-30	0.000
-25	0.070
-20	0.091
-15	0.039
-10	0.150
-5	0.297
0	0.971
5	0.296
10	0.114
15	0.034
20	0.075
25	0.057
30	0.000

Table IV

TABLE V

HAAT AND DISTANCE TO CONTOUR DATA

PROPOSED CH 24 DTV ALLOTMENT

VINELAND, NEW JERSEY

JUNE 2000

Callsign : PROP CH 24 DTV
 Coordinates : 39-43-41 N, 74-50-39 W
 Channel : 24
 Frequency (MHz): 531.12500
 HAAT (m): 243.80 AMSL (m): 269.00
 Elevation (m): 31.40 Tower AGL (m): 234.90
 ERP (Kw): 100

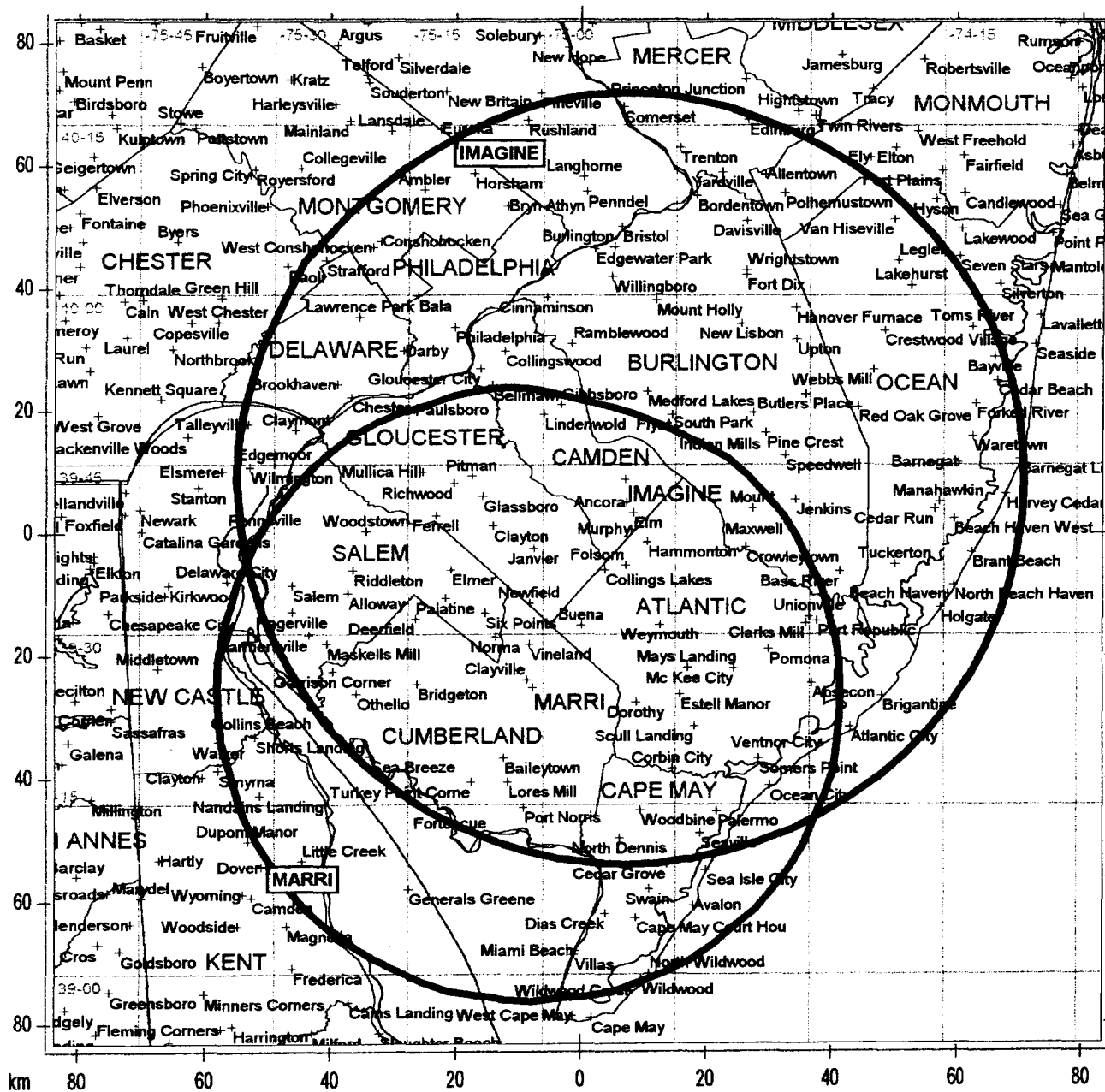
 City/State : VINELAND, NJ
 ARN : BPCT-960920YV/BPCT-960920LO

 Licensee : IMAGINE TELEVISION/MARRI BROADCASTING

Contour type : F(50,90)
 Signal strength : 41.000 dBu
 Area covered : 13964.800 sq. km
 Population covered: 5473777 persons

Brg	HAAT	Dist	Brg	HAAT	Dist	Brg	HAAT	Dist	Brg	HAAT	Dist
0	247	67.2	90	256	67.8	180	246	67.6	270	232	66.6
5	247	65.4	95	256	69.4	185	244	65.7	275	231	68.0
10	245	63.6	100	256	70.7	190	244	64.1	280	231	69.3
15	244	61.5	105	256	71.9	195	244	62.3	285	227	70.1
20	241	60.2	110	257	72.8	200	243	61.1	290	227	70.8
25	243	59.2	115	256	73.5	205	241	59.7	295	227	71.5
30	243	59.0	120	256	73.9	210	241	59.5	300	229	72.1
35	245	59.1	125	255	74.3	215	241	59.3	305	235	72.9
40	248	59.3	130	253	74.3	220	240	59.4	310	231	72.8
45	247	59.4	135	252	74.4	225	238	59.5	315	231	72.9
50	247	59.3	140	251	74.2	230	237	59.2	320	228	72.5
55	249	59.3	145	249	73.9	235	233	58.8	325	230	72.5
60	252	59.6	150	248	73.4	240	231	58.9	330	230	72.0
65	254	59.8	155	248	73.0	245	231	59.1	335	234	71.9
70	255	61.1	160	247	72.2	250	231	60.3	340	238	71.4
75	256	62.3	165	245	71.4	255	231	61.4	345	242	70.9
80	256	64.3	170	244	70.2	260	230	63.2	350	245	70.0
85	256	66.0	175	246	69.1	265	230	64.7	355	247	68.8

CH 59 NTSC IMAGINE TELEVISION & MARRI BROADCASTING VINELAND, NJ



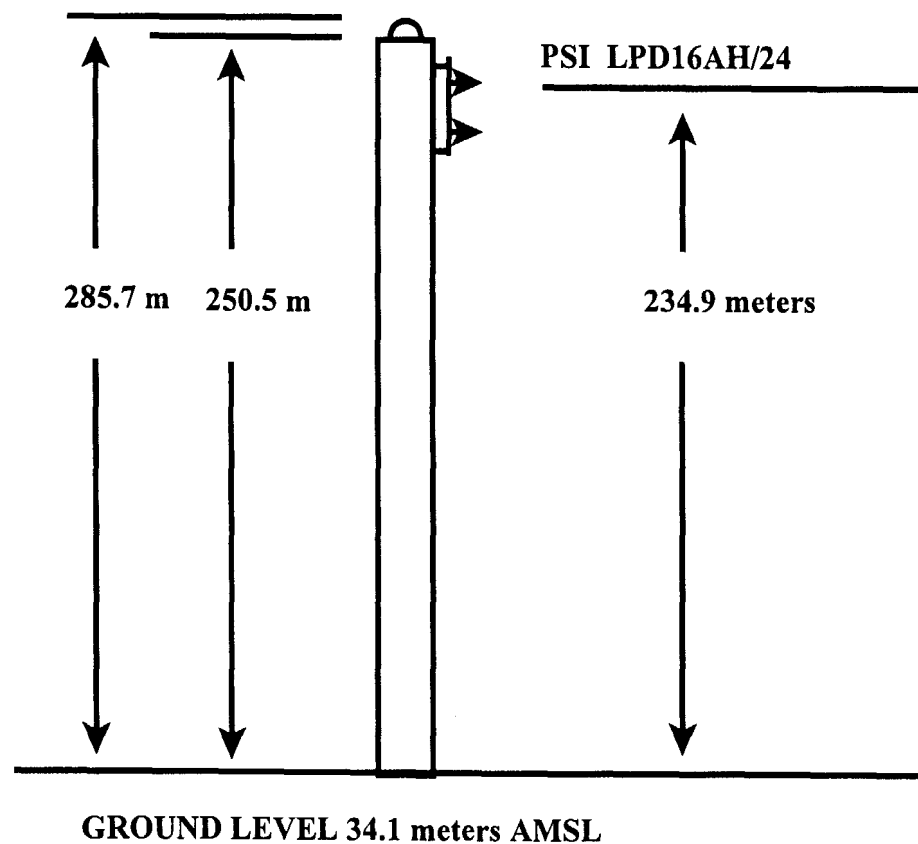
Communications Technologies, Inc. Marlton, New Jersey 08053

County Borders State Borders Lat/Lon Grid

Map Scale: 1:1054224 1 cm = 10.54 km VJH Size: 166.76 x 166.76 km

FIGURE 1

N.L. 39° 43' 41"
W.L. 74° 50' 39"
NAD 27
FCC Reg. #1045125



OTHER ANTENNAS ON
STRUCTURE NOT SHOWN
NOT TO SCALE

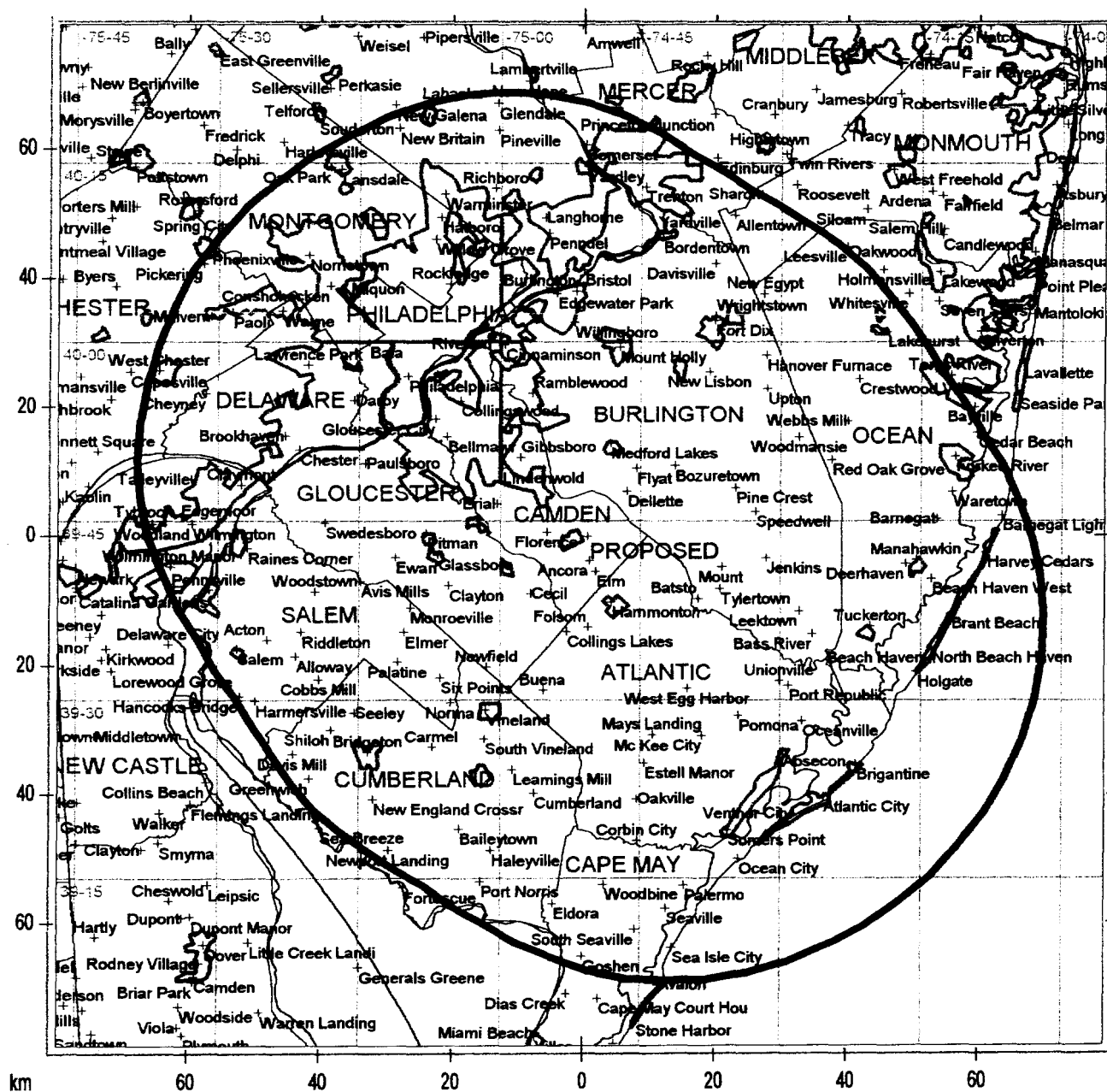
FIGURE 2

VERTICAL PLAN SKETCH

PROPOSED CH 24 DTV
VINELAND, NEW JERSEY

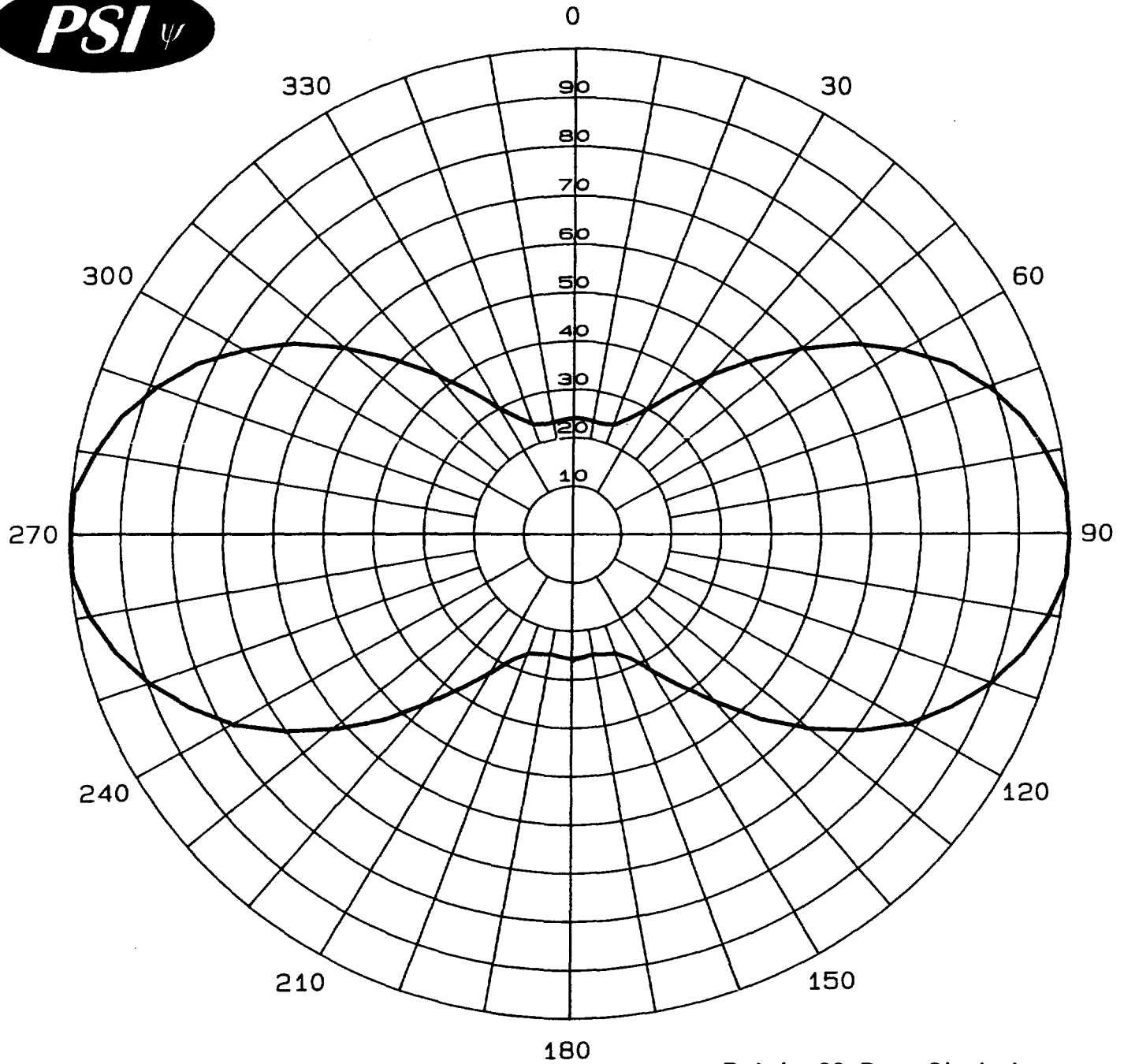
Communications Technologies, Inc.
Marlton, New Jersey
June 2000

CH 24 DTV 100 kW MAX DA @ 244 M HAAT VINELAND, NEW JERSEY



Communications Technologies, Inc. Marlton, New Jersey 08053

County Borders
 State Borders
 City Borders
 Lat/Lon Grid



Calculated Relative Field
Azimuth Plane Pattern
Antenna: PSILPD16AH/24
Type: 16-Bay Digital Slot
Directivity: 2.46 (3.91 dB)
Peak Gain: 40.81 (16.11 dB)
Channel: 24
Ref. P61200-1B

Propagation Systems Inc.
PO Box 113
Ebensburg, PA 15931

Figure 4

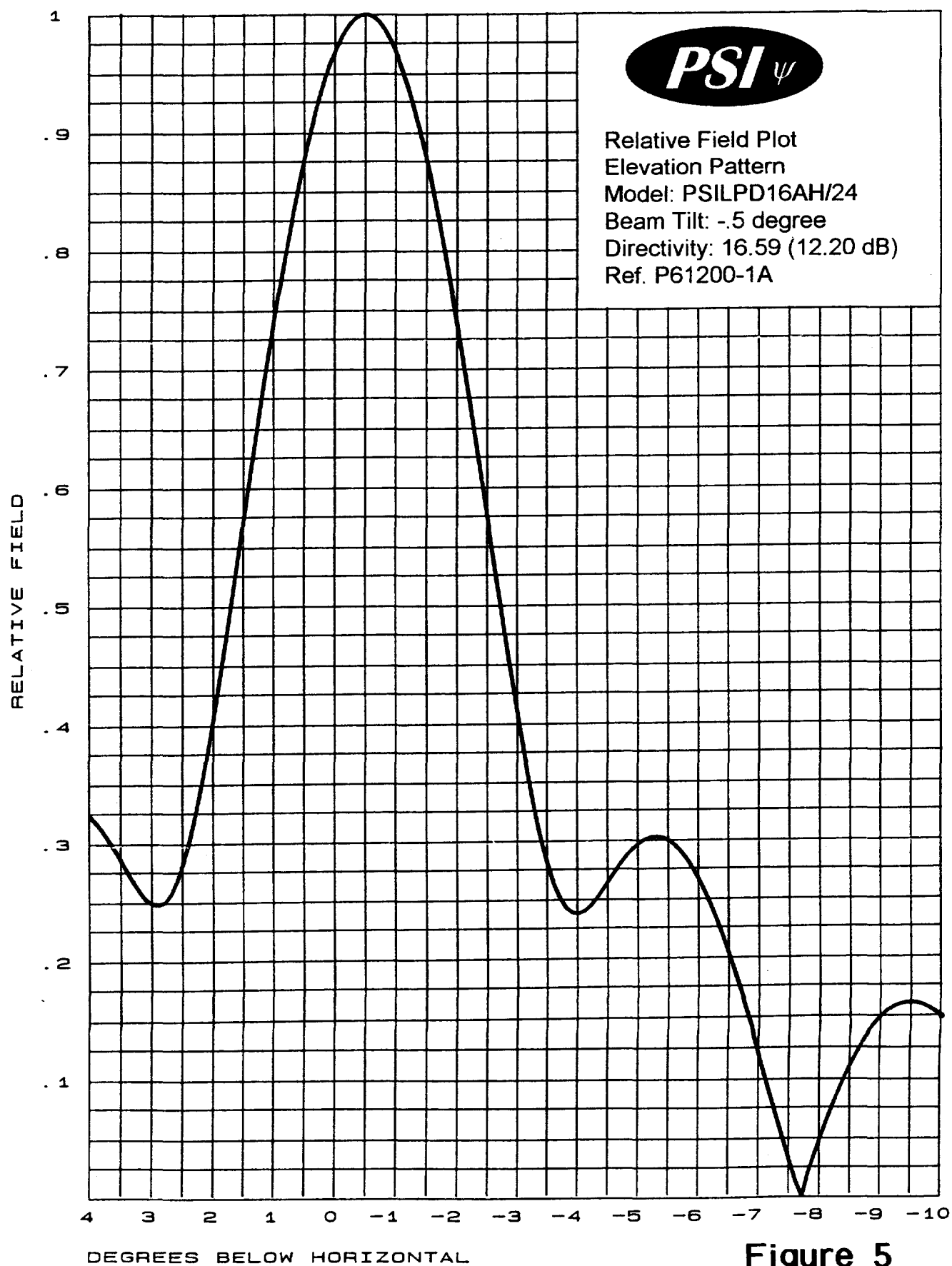
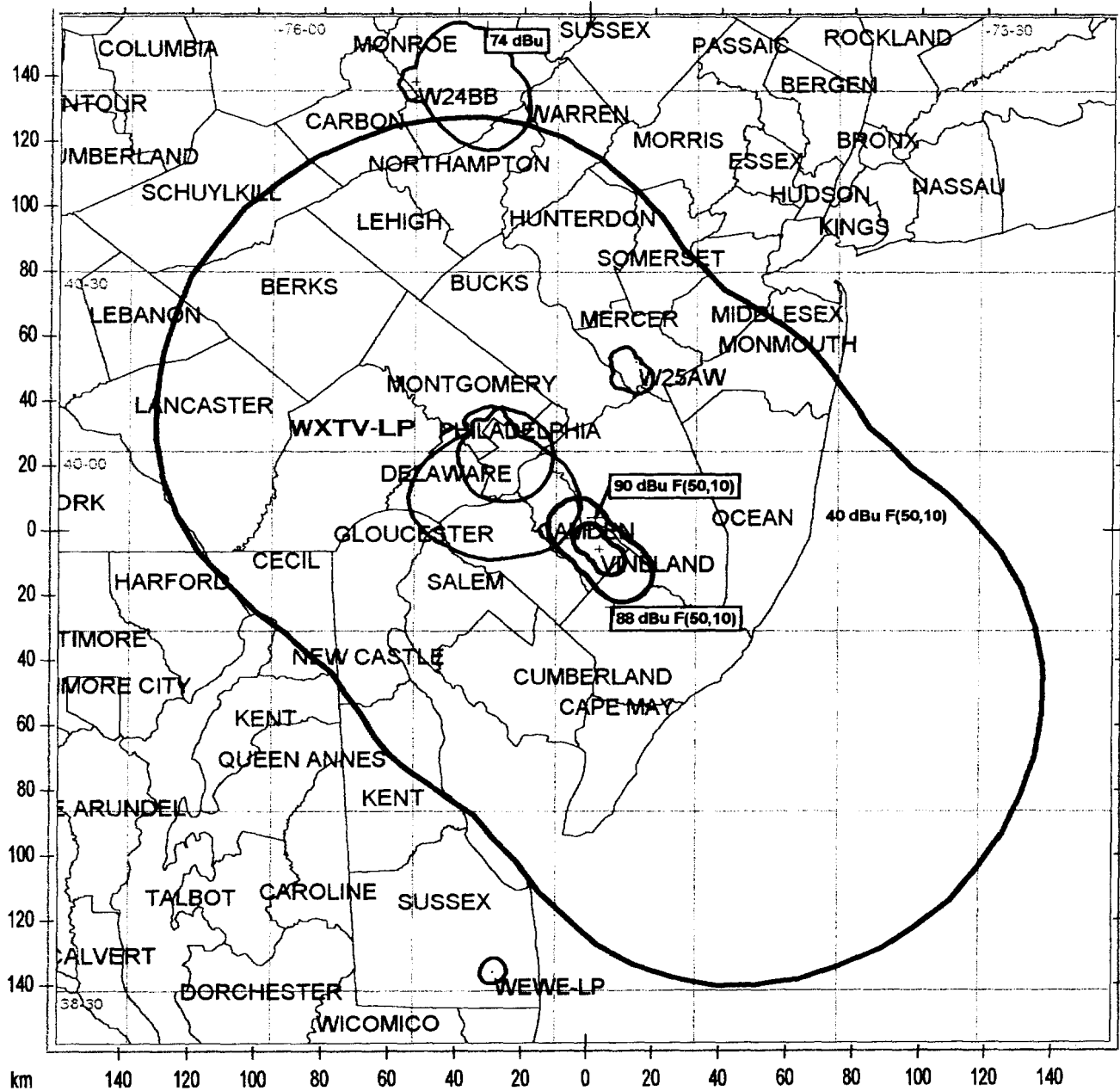


Figure 5

CH 24 DTV 100 kW @ 244 M HAAT VINELAND, NEW JERSEY



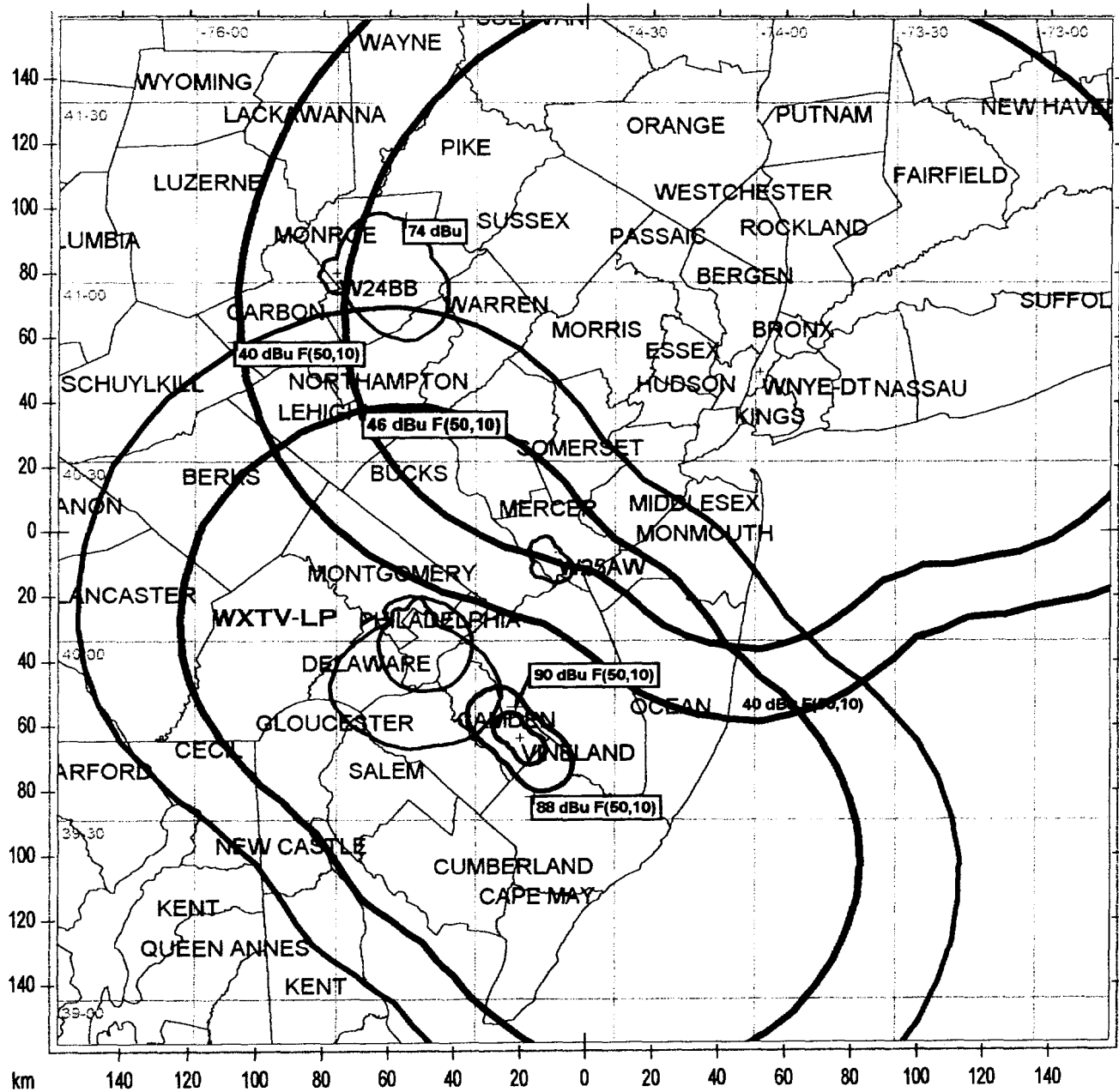
Communications Technologies, Inc. Marlton, New Jersey 08053

County Borders Lat/Lon Grid

Map Scale: 1:2000000 1 cm = 20.00 km V/H Size: 316.37 x 316.37 km

FIGURE 6

CH 24 DTV 100 kW @ 244 M HAAT VINELAND, NEW JERSEY



Communications Technologies, Inc. Marlton, New Jersey 08053

County Borders Lat/Lon Grid

Map Scale: 1:2000000 1 cm = 20.00 km V/H Size: 316.37 x 316.37 km

FIGURE 7